

1-800-RECONEX

Because Everybody Needs A Phone™

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OFFICE OF THE
EXECUTIVE SECRETARY
Mr. David Waddell
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243-0505

TELECOMMUNICATIONS DIVISION

Re: 1-800-RECONEX, Inc. (Docket No. 01-00337)

Dear Mr. Waddell:

Please accept this correspondence as a response to your request for additional information in the application of 1-800-RECONEX, Inc. ("Reconex") for a Certificate to provide competitive local telecommunications services as a facilities-based provider within the state of Tennessee. Below please find the responses to your questions:

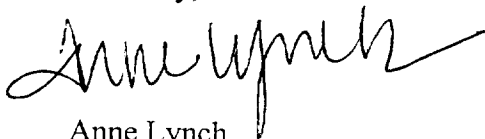
Financial Requirements:

- 1) Positive net income is expected during the first half of 2002
- 2) In operating a company such as Reconex, while positive net income is desirable, positive cash flow is a must. That is the primary focus of the company. On the company's current forecast for the rest of 2001, EBITDA (Earnings Before Income Taxes, Depreciation and Amortization) which is a key indicator for determining cash-flow trends, is positive for the final six months of 2001.

Enclosed please find a revised Toll Dialing Parity Plan reflecting a statement concerning nondiscriminatory access to telephone numbers, operator services, directory assistance, and directory listings.

If you have any questions or need any further information, please do not hesitate to contact me directly at 503-982-5572 or anne.lynch@reconex.com.

Sincerely,



Anne Lynch
Regulatory Manager

1-800-RECONEX, INC.
INTRALATA TOLL DIALING PARITY PLAN

INTRODUCTION

1-800-RECONEX, Inc. ("Reconex") will initiate the process that will give end-user customers the opportunity to designate a carrier for their intraLATA toll call traffic in those market areas where Reconex is a facilities-based local exchange service provider. IntraLATA toll calls will automatically be directed to the designated carrier without the customer having to dial an access code.

POLICIES

Reconex will have its underlying service providers deploy two-PIC (Primary Interexchange Carrier) technology in its switches (or switch partitions). This technology will enable the customer to presubscribe to the same or a different carrier for their intraLATA and/or interLATA service.

Appropriate tariffs will be revised and filed in accordance with this plan.

Reconex will offer customers the ability to access all participating carriers by dialing the appropriate access code (10XXX/101XXXX).

All eligible Reconex end user telephone line numbers will be presubscribed and must have a PIC associated with them.

CARRIER INFORMATION

Interexchange carriers will have the option of offering intraLATA service only or intraLATA and interLATA service.

Interexchange carriers will have the option of participating in all market areas or in a specific market area.

Interexchange carriers will be required to return a completed Non-Disclosure Agreement and Participation Agreement(s).

Reconex will not participate in billing disputes for intraLATA service between alternative competing interexchange carriers and their customers.

Reconex representatives will not initiate or accept three-way calls from alternative interexchange carriers to discuss presubscription.

Carriers wishing to participate will be requested to submit Access Service Requests/Translation Questionnaires to the Access Tandem owner and to Reconex.

CALL ELIGIBILITY/TOLL DIALING PLAN

A local service customer of Reconex will have calls routed according to the following plan:

<u>If Reconex Customers Dial:</u>	<u>The Call is Handled By/Routed To:</u>
911	PSAP on originating line number
411/555-1212	Reconex Directory Assistance Operator
0-	Reconex Operator
0+ intraexchange number	IntraLATA Toll Provider
1 + 7 or 10 digits	IntraLATA Toll Provider
0 + 7 or 10 digits interexchange number	InterLATA Toll Provider
10XXX or 101XXXX + 0	XXX/XXXX Carrier
10XXX or 101XXXX + 0 + 7 or 10 digits	XXX/XXXX Carrier
10XXX or 101XXXX + 7 or 10 digits	XXX/XXXX Carrier

If a Reconex customer originates a call to a carrier Operator by dialing 00-, the call will be routed to the PIC on that customer's line. If the customer originates a call to a carrier Operator by dialing an access code (e.g., 10XXX/101XXXX+0-), the call will be routed to the XXX/XXXX carrier. In both cases, the carrier's switch is responsible for routing this call to the carrier's Operator or to an announcement.

NETWORK INFORMATION

All originating intraLATA traffic will initially be routed via the incumbent Local Exchange Carrier (LEC) Access Tandem(s). Following conversation, direct trunks between the Reconex switch and (or partition) and the interexchange carrier location(s) may be provisioned where traffic volumes warrant.

Interexchange carriers must have Feature Group D trunks in place (or ordered) between their points of presence and the incumbent LEC Access Tandem(s).

Reconex will route all originating intraLATA traffic to the designated carrier and will only block traffic at the request of the end user customer and/or in compliance with regulatory requirements. Requests from carrier to block traffic or to remove customer from their network will not be honored. Calls that cannot be completed to a carrier will be routed to an announcement.

CUSTOMER CONTACT INFORMATION

Reconex customer contact representative will process customer initiated PIC selections to Reconex or to an alternative intraLATA carrier. Carriers will have the option of allowing the Reconex representative to process PIC requests on their behalf.

Reconex will not ballot or allocate their customer base. At the time of conversation, all customers will be "PIC'd" to Reconex or its designee unless another carrier is chosen by the particular customer.

Reconex customer contact representative will not comment on a customer's choice of its intraLATA PIC when the customer contacts Reconex to change the PIC. Reconex customer contact representatives will respond to customer inquiries about intraLATA carriers in a competitively neutral fashion. If a customer requests information relating to carriers other than Reconex, a list of participating carriers will be read to that customer in random order by Reconex representatives.

If the intraLATA toll carrier selected by the customer permits Reconex to process orders on its behalf, Reconex will accept the PIC change request. If the customer selects an intraLATA toll carrier that does not allow Reconex to process PIC changes on its behalf, Reconex will provide the customer with the carrier's toll-free number (if provided by the carrier).

Reconex representatives will not discuss alternative carrier rates or services and will not provide customers with Carrier Identification Codes or access code dialing instructions.

MISCELLANEOUS ITEMS

Slamming – Reconex will be subject to rules relating to slamming as indicated in Tennessee Regulatory Authority Rule 1220-4-2-.56, Sections (2)-(19) and 1220-4-2.58, Sections (1)-(16).

Nondiscriminatory Access – Reconex will provide nondiscriminatory access for their customers, including any Resellers, as it relates to access of telephone numbers; operator assistance; directory assistance; and director listing.

PRESUBSCRIPTION INFORMATION

A \$5.00 change charge will be incurred and billed to a Reconex customer for each eligible line where a PIC change is made. Reconex will offer its customers a 12-month grace period following Plan implementation during which the customers may change intraLATA carriers without a PIC change charge. Customers can make one PIC change during these 12 months at no charge. After the 12-month period, Reconex will assess the

\$5.00 PIC change charge. Reconex offers interexchange carriers the option of having the PIC charge billed to the carrier or to the customer.

New line customers, including customers adding lines, will have the opportunity to select a participating carrier, or they will be assigned a NO PIC designation. If a customer cannot decide upon an intraLATA carrier at the time of order, Reconex will offer the customer a 12-month grace period following placement of the customer's service order for the customer to select an intraLATA carrier without charge. Such a customer will be assigned NO PIC designation in the interim. After this 12-month period, Reconex will assess the \$5.00 PIC change charge as described above. Customers assigned a NO PIC designation as set forth in this paragraph will be required to dial an access code to reach an intraLATA carrier's network.

If a Reconex customer denies requesting a change in intraATA toll providers as submitted by an intraLATA carrier, and the intraLATA carrier is unable to produce a Letter of Agency signed by the customer, the intraLATA carrier will be assessed a \$30.00 charge for the unauthorized PIC change and the PIC will be changed as per the customer's request, in addition to any other penalties authorized by law.

Alternative interexchange carriers may submit PIC changes to Reconex via a fax/paper interface.

Reconex will process intraLATA PIC selections in the same manner and under the same intervals of time as interLATA PIC changes.

Carriers will be required to submit PIC changes using the Customer Account Record Exchange (CARE) format via paper medium. Reconex will provide carriers with PIC order confirmation and reject information using the CARE format. Specific details regarding CARE will be provided to participating carriers.

For customers who change their local service provide from the incumbent LEC to Reconex and retain their incumbent LEC telephone number(s), Reconex, as a part of the CARE PIC process, will provide the selected intraLATA carrier with both the retained (incumbent LEC) telephone number and the Reconex telephone number.

Dated: June 19, 2001